

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SUSAN CHANDLER, *et al.*,

Plaintiff,

v.

Civil Action No. 3:14-cv-19-REP

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

DEFENDANT'S MOTION TO DISMISS

Defendant, Midland Credit Management, Inc. ("Midland"), by counsel, pursuant to Fed. R. Civ. P. 12(b)(6), files this Motion to Dismiss. The reasons in support of the Motion are set forth in full in the accompanying memorandum.

WHEREFORE, Defendant, Midland Credit Management, Inc., by counsel, hereby requests that the Court enter an Order: (1) granting Midland's Motion to Dismiss; and (2) awarding Midland such further relief as the Court deems appropriate.

MIDLAND CREDIT MANAGEMENT, INC.

By: /s/ Timothy J. St. George

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of March, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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